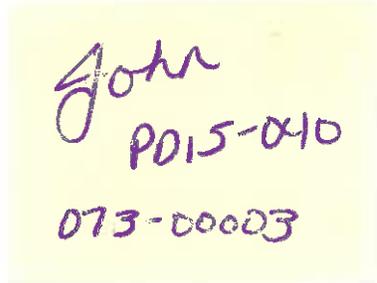




CYTEC

#1 Heilman Avenue
Willow Island, WV 26134
(304) 665-2422

May 8, 2015



**CERTIFIED MAIL
RETURN RECEIPT**

Ms. Bev McKeone
NSR Permitting Program Manager
Division of Air Quality, DEP
601 57th Street, S.E.
Charleston, WV 25304

**CYTEC INDUSTRIES INC.
WILLOW ISLAND PLANT**

SUBJECT: NOTIFICATION OF PLAN TO PRODUCE NEW PRODUCT

REFERENCE: PERMIT NO. R13-2120I, Issued: April 7, 2015

Dear Ms. McKeone:

In accordance with Section 4.5.1 of the above referenced permit for the Surfactant's Manufacturing Unit at Cytec's Willow Island Plant, Cytec is providing notification of its intent to produce a new product variant not addressed in application number R13-2120 or its amendments.

The new product is AEROSOL® OT-GPG-N Surfactant (OT-GPG-N), which is a variant of our existing product AEROSOL® OT-GPG Surfactant (OT-GPG). OT-GPG-N utilizes methanol at 8% - 12% concentration as a carrier solvent in the final product due to customer requirements. The Material Safety Data Sheet for OT-GPG-N is enclosed.

In accordance with emission modeling requirements specified in Section 4.4.4 of the current permit, Cytec has estimated emissions from the new process using the Mitchell Scientific - *Emission Master* modeling software:

- Abated VOC maximum theoretical emissions from the model are estimated at 0.20 pound per hour and 0.122 ton per year of total VOC emissions. [Actual production volumes of OT-GPG-N are anticipated to be considerably lower.] These emissions are well below the permitted VOC emission limits of 92.09 pounds per hour and 26.9 tons per year. HAP (methanol) emissions are a component of the VOC emissions -- abated HAP maximum theoretical emissions from the model are estimated at 0.20 pound per hour and 0.122 ton per year of total HAP emissions.
- Abated SO₂ maximum theoretical emissions from the model are estimated at 0.15 pound per hour and 0.026 ton per year of total SO₂ emissions. These emissions are well below the permitted SO₂ emission limits of 0.7 pounds per hour and 0.24 tons per year.
- Abated PM maximum theoretical emissions from the model are estimated at 0.072 pound per hour and 0.025 ton per year of total PM emissions. These emissions are well below the permitted PM emission limits of 15.7 pounds per hour and 0.9 tons per year.

Ms. Bev McKeone

May 8, 2015

Page 2

The summary information from the emission model documenting the emissions anticipated to be generated per batch of OT-GPG-N production and an estimate of theoretical maximum production rate has been enclosed for your information.

The manufacture of this new product will not cause Cytec to exceed any of the emissions limitations currently specified in the referenced air permit. As required under Section 4.4.6, Cytec will begin to include the emissions attributable to the production of the OT-GPG-N product in future quarterly emissions reports.

Certain information in this submittal is considered to be Confidential Business Information. To facilitate the review of this notification, the confidential information is provided on colored paper as specified in 45 CSR 31.3.3a. The Justification for Confidentiality Cover Document has been completed per 45 CSR 31.3.3b. Two non-colored copies of the notification with confidential information redacted and so marked per 45 CSR 31.3.4 are also enclosed.

If you have any questions or require additional information, please feel free to contact our technical contact Mr. John Pitner at (304) 665-3485.

Very truly yours,

CYTEC INDUSTRIES INC.

A handwritten signature in black ink, appearing to read "Michael A. Young", written in a cursive style.

Michael A. Young
Site Manager

MAY/jp

Enclosures

Enclosures

Material Safety Data Sheet

- AEROSOL® OT-GPG-N Surfactant

Rule 31 Claim Confidential Cover Sheet

AEROSOL® OT-GPG-N - Theoretical Maximum Production Basis /
VOC / SO₂ / PM - Emissions Summary

Emission Master Model Summary – AEROSOL® OT-GPG-N

SAFETY DATA SHEET

1. IDENTIFICATION

Product Name: AEROSOL® GPG-N Surfactant
Synonyms: Sodium dioctyl sulfosuccinate in mixture of methanol and water
Chemical Family: Ester
Molecular Formula: C₂₀H₃₇O₇NaS
Molecular Weight: 444
Intended/Recommended Use: Surfactant

CYTEC INDUSTRIES INC., FIVE GARRET MOUNTAIN PLAZA, WOODLAND PARK, NEW JERSEY 07424, USA
For Product and all Non-Emergency Information call 1-800/652-6013. Outside the USA and Canada call 1-973/357-3193.

EMERGENCY PHONE (24 hours/day) - For emergency only involving spill, leak, fire, exposure or accident call:

Asia Pacific:

Australia - +61-3-9663-2130 or 1800-033-111
China (PRC) - +86 0532 83889090 (NRCC)
New Guinea - +61-3-9663-2130
New Zealand - +61-3-9663-2130 or 0800-734-607
All Others - +65 3158 1074 (Carechem24 Singapore)

Canada: +1-905-356-8310 (Cyttec Welland, Canada plant)

Europe/Africa/Middle East (Carechem24 UK):

Europe, Middle East, Africa, Israel - +44 (0) 1235 239 670
Middle East, Africa (Arabic speaking countries) - +44 (0) 1235 239 671

Latin America:

Brazil - 0800 7077 022 (SUATRANS)
Chile - +56-2-247-3600 (CITUC QUIMICO)
All Others - +52-376-73 74122 (Cyttec Atequiza, Mexico plant)

USA: +1-703-527-3887 or 1-800-424-9300 (CHEMTREC #CCN6083)

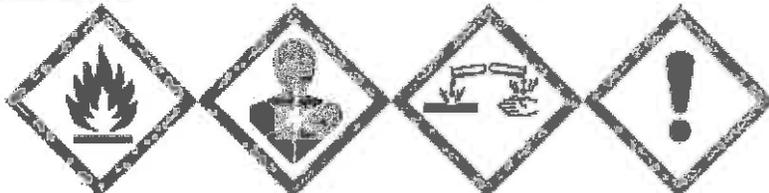
The ® indicates a Registered Trademark in the United States and the ™ indicates a trademark in the United States. The mark may also be registered, subject of an application for registration, or a trademark in other countries.

2. HAZARDS IDENTIFICATION

GHS Classification

Flammable Liquid Hazard Category 3
Acute Toxicity (Oral) Hazard Category 4
Specific Target Organ Toxicity - Single Exposure Hazard Category 1
Skin Corrosion / Irritation Hazard Category 2
Serious Eye Damage / Eye Irritation Hazard Category 1

LABEL ELEMENTS



Signal Word

Danger

Hazard Statements

Flammable liquid and vapor

Harmful if swallowed

Causes damage to organs

Causes skin irritation

Causes serious eye damage

Precautionary Statements

Keep away from heat/sparks/open flames/hot surfaces. - No smoking.

Keep container tightly closed.

Ground/Bond container and receiving equipment.

Use explosion-proof electrical/ventilating/lighting/equipment.

Use only non-sparking tools.

Take precautionary measures against static discharge.

Wear protective gloves/protective clothing/eye protection/face protection.

Wash face, hands and any exposed skin thoroughly after handling.

Do not eat, drink or smoke when using this product.

Do not breathe dust/fume/gas/mist/vapours/spray.

IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower.

In case of fire: Use CO₂, dry chemical, or foam for extinction.

IF SWALLOWED: Call a POISON CENTER or doctor/physician if you feel unwell.

Rinse mouth.

Specific treatment (see supplemental first aid instructions on this label).

Take off all contaminated clothing and wash it before reuse.

IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

Immediately call a POISON CENTER or doctor/physician.

Store in a well-ventilated place. Keep cool.

Store locked up.

Dispose of contents/container in accordance with local and national regulations.

Hazards Not Otherwise Classified (HNOC), Other Hazards

Use mechanical exhaust ventilation when heat-curing material.

3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance, Mixture or Article? Mixture

HAZARDOUS INGREDIENTS

Component / CAS No.	%	GHS Classification	Carcinogen
Sodium dioctyl sulfosuccinate 577-11-7	68 - 72	Skin Irrit. 2 (H315) Eye Dam. 1 (H318)	-
Methanol 67-56-1	8 - 12	Flam. Liq. 2 (H225) Acute Tox. 3 (H301) Acute Tox. 3 (H311) Acute Tox. 3 (H331) STOT SE 1 (H370) Skin Irrit. 3 (H316) Eye Irrit. 2B (H320)	

Additional GHS classification or other information may be included in this section but has not been adopted by OSHA. See Section 16 for full text of H phrases.

4. FIRST AID MEASURES

DESCRIPTION OF FIRST AID MEASURES

Eye Contact:

Rinse immediately with plenty of water for at least 15 minutes. Obtain medical attention immediately.

Skin Contact:

Remove contaminated clothing and shoes without delay. Wash immediately with plenty of water. Do not reuse contaminated clothing without laundering. Get medical attention if pain or irritation persists after washing or if signs and symptoms of overexposure appear.

Ingestion:

If swallowed, call a physician immediately. Only induce vomiting at the instruction of a physician. Never give anything by mouth to an unconscious person.

Inhalation:

Remove to fresh air. If breathing is difficult, give oxygen. Obtain medical advice if there are persistent symptoms.

MOST IMPORTANT SYMPTOMS AND EFFECTS, BOTH ACUTE AND DELAYED

None known

INDICATION OF ANY IMMEDIATE MEDICAL ATTENTION AND SPECIAL TREATMENT NEEDS

Notes To Physician:

Ethanol is an effective antidote for methanol. Patients with visual abnormalities or a methanol level exceeding 6 to 9 mmol/L (20 to 30 mg/dL) should be treated with the following: the loading dose of ethanol is 10 ml/kg body weight of 10% ethanol intravenously or 1ml/kg body weight of 95% ethanol by mouth. The maintenance dose is 1.5 ml/kg body weight per hour of 10% ethanol intravenously and 3.0 ml/kg body weight per hour of 10% ethanol intravenously during dialysis. Therapy should be continued until the serum methanol level falls below 6 mmol/L (20 mg/dL) and all clinical signs have resolved. Methanol is cleared by hemodialysis.

5. FIRE-FIGHTING MEASURES

Suitable Extinguishing Media:

Use water spray, alcohol foam, carbon dioxide or dry chemical to extinguish fires. Water stream may be ineffective.

Extinguishing Media to Avoid:

full water jet

Protective Equipment:

Firefighters, and others exposed, wear self-contained breathing apparatus. Wear full firefighting protective clothing. See MSDS Section 8 (Exposure Controls/Personal Protection).

Special Hazards:

Keep containers cool by spraying with water if exposed to fire.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions:

Where exposure level is known, wear approved respirator suitable for level of exposure. Where exposure level is not known, wear approved, positive pressure, self-contained respirator. In addition to the protective clothing/equipment in Section 8 (Exposure Controls/Personal Protection), wear impermeable boots.

Methods For Cleaning Up:

Remove sources of ignition. Cover spills with some inert absorbent material; sweep up and place in a waste disposal container. Flush spill area with water.

References to other sections:

See Sections 8 and 13 for additional information.

7. HANDLING AND STORAGE

HANDLING

Precautions: Keep away from heat, sparks and open flame. - No smoking. Keep container tightly closed. Ground/Bond container and receiving equipment. Use explosion-proof electrical, ventilating, lighting and other equipment. Use only non-sparking tools. Take precautionary measures against static discharge. Wear protective gloves and eye/face protection. Wash hands thoroughly after handling. Do not eat, drink or smoke when using this product. Do not breathe vapors or spray mist.

Special Handling Statements: Containers must be bonded and grounded when pouring or transferring material.

STORAGE

Areas containing this material should have fire safe practices and electrical equipment in accordance with applicable regulations and/or guidelines. Standards are primarily based on the material's flashpoint, but may also take into account properties such as miscibility with water or toxicity. All local and national regulations should be followed.

In the Americas, National Fire Protection Association (NFPA) 30: Flammable and Combustible Liquids Code, is a widely used standard. NFPA 30 establishes storage conditions for the following classes of materials: Class I Flammable Liquids, Flashpoint <37.8 °C. Class II Combustible Liquids, 37.8 °C < Flashpoint <60 °C. Class IIIa Combustible Liquids, 60 °C < Flashpoint < 93 °C. Class IIIb Combustible Liquids, Flashpoint > 93 °C.

Storage Temperature: Room temperature

Reason: Quality.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Engineering Measures:

Where this material is not used in a closed system, good enclosure and local exhaust ventilation should be provided to control exposure. Utilize a closed system process where feasible.

Respiratory Protection:

Where exposures are below the established exposure limit, no respiratory protection is required. Where exposures exceed the established exposure limit, use respiratory protection recommended for the material and level of exposure.

Eye Protection:

Wear eye/face protection such as chemical splash proof goggles or face shield. Prevent eye and skin contact. Provide eye wash fountain and safety shower in close proximity to points of potential exposure.

Skin Protection:

Avoid skin contact. Wear impermeable gloves and suitable protective clothing. Since this product is absorbed through the skin, care must be taken to prevent skin contact and contamination of clothing.

Hand Protection:

Wear impermeable gloves. Replace gloves immediately when torn or any change in appearance (dimension, colour, flexibility etc) is noticed. Barrier creams may help to protect the exposed areas of the skin, they should however not be applied once exposure has occurred.

Additional Advice:

Food, beverages, and tobacco products should not be carried, stored, or consumed where this material is in use. Before eating, drinking, or smoking, wash face and hands thoroughly with soap and water.

Exposure Limit(s)

67-56-1	Methanol	
OSHA (PEL):	200 ppm (TWA)	260 mg/m ³ (TWA)
ACGIH (TLV):	250 ppm (STEL)	(skin)
	200 ppm (TWA)	
Other Value:	Not established	

9. PHYSICAL AND CHEMICAL PROPERTIES

Color:	water white to pale yellow	
Appearance:	viscous liquid	
Odor:	soap-like	
Boiling Point:	86 °C	186 °F
Melting Point:	Not applicable	
Vapor Pressure:	Not applicable	
Specific Gravity/Density:	~1.04 - 1.08	
Vapor Density:	Not applicable	
Percent Volatile (% by wt.):	28 - 32	
pH:	5 - 7 (0.1% aqueous solution)	
Saturation In Air (% By Vol.):	Not applicable	
Evaporation Rate:	greater than 1	
Solubility In Water:	Not available	
Volatile Organic Content:	Not available	
Flash Point:	35 °C	95 °F Closed Cup
Flammable Limits (% By Vol):	Lower: 6	Upper: 36.5(values for methanol)
Autoignition (Self) Temperature:	Not applicable	
Decomposition Temperature:	Not applicable	
Partition coefficient (n-octanol/water):	Not applicable	
Odor Threshold:	Not available	
Viscosity (Kinematic):	Not applicable	

10. STABILITY AND REACTIVITY

Stability:	Stable
Conditions To Avoid:	None known
Polymerization:	Will not occur
Conditions To Avoid:	None known
Materials To Avoid:	Strong oxidizing agents.
Hazardous Decomposition Products:	Carbon dioxide Carbon monoxide (CO) methanol sulfates

11. TOXICOLOGICAL INFORMATION**PRODUCT TOXICITY INFORMATION**

Likely Routes of Exposure: Eyes, Skin, Oral.**ACUTE TOXICITY DATA**

oral	rat	Acute LD50	~830 mg/kg
dermal	rabbit	Acute LD50	>2000 mg/kg
inhalation	rat	Acute LC50 4. hr	>20 mg/l (Vapors)

LOCAL EFFECTS ON SKIN AND EYE

Acute Irritation	skin	Irritating
Acute Irritation	eye	Causes serious damage

ALLERGIC SENSITIZATION

Sensitization	skin	Not sensitizing
Sensitization	respiratory	No data

GENOTOXICITY**Assays for Gene Mutations**

Ames Salmonella Assay No data

OTHER INFORMATION

The product toxicity information above has been estimated.

HAZARDOUS INGREDIENT TOXICITY DATA

Sodium dioctyl sulfosuccinate (DSS) has an average oral (rat) LD50 >2000 mg/kg based on multiple test values. The dermal (rabbit) LD50 is >10 g/kg. DSS has caused skin and eye irritation in animals, to varying extents, depending on the formulation of the tested material (e.g. solid vs. solution), the tested concentration, and the exposure duration. Following 24-hour dermal application (rabbits) of 8 - 10 g/kg solid DSS, the only effect observed was mild erythema. In other rabbit skin irritation tests, the primary irritation score for 100% DSS was ~ 4 and that for 80% DSS with propylene glycol was ~3, both resulting in a moderate irritant classification. In another study, a volume of 0.5 mL Docusate sodium (70% solution in ethanol/methanol and water) was applied on 6 cm² shaved skin of 3 male rabbits by occlusive application. After this period, the skin area was washed with warm water and observed after 1, 24, 48, 72 hours and 6, 8, 10 and 14 days. The results showed that there was an irritation index of 7.8/8 over the 1 -72 hour period and some effects were still visible at 14 days. In rabbits, a concentration of 1% was the lowest reported effective dose necessary to produce slight dermal erythema and at concentrations from 5 - 25% moderate dermal irritation occurred. Solid DSS applied to the eyes of rabbits produced moderate irritation. Mild eye irritation in rabbits occurred following treatment with concentrations between 0.1 and 0.5% DSS. In one study, a volume of 0.1 mL Docusate sodium (mixture of 70% docusate sodium, ethanol in methanol, water) was applied to the eyes of 3 male rabbits. After 72 hours, fluorescein solution was applied for cornea evaluation and rinsing was performed with warm physiological solution. Evaluation after 1, 24, 48 and 72 hours and 6, 8, 10, 13, 17 and 21 days after application showed severe eye irritation and irreversible damage (including turbidity of the cornea). The mean overall irritation score for 1 -72 hours was 46,67/110. Humans appear to be less sensitive to DSS for skin irritation. In humans, a concentration of 1% was the highest no-effect level observed for skin irritation following a 24-hr patch test. In a modified Draize-Shelanski repeat-insult patch test, DSS showed little evidence of irritation and no evidence of eliciting an allergic response in human subjects. Results from a 90-day subacute oral diet (rat) study indicate a NOEL of 0.94 g/kg/day and results from a 6-month subchronic oral diet (rat) study indicate a LOEL of 0.87 g/kg/day. No indication of significant gross or microscopic adverse effects were reported. This material was not mutagenic in the Ames Assay. Chronic toxicity studies in rats (2-yr) and dogs (1-yr) also reported no significant adverse effects at the doses administered. No adverse effect on reproductive function or fetal development were observed in rats treated with DSS at 0.5 and 1.0% doses, which were not maternally toxic.

Methanol has acute oral (rat) and dermal (rabbit) LD50 values of >5600 mg/kg and 15800 mg/kg, respectively. The 4-hour inhalation exposure LC50 (rat) for methanol vapor is 64,000 ppm (83.78 mg/L). Acute exposure to methanol vapor may cause headache and gastrointestinal irritation. Chronic or extreme inhalation exposure to vapors can cause blurred vision, serious eye damage, central nervous depression and death. Ingestion and inhalation of methanol has caused blindness in humans. Ingestion can also cause harmful effects on the central nervous system and gastrointestinal systems and can lead to death in extreme cases. Absorption of methanol can cause systemic toxicity. It has been reported that chronic skin absorption of methanol has caused ocular disturbances and blindness. Methanol has also been reported to be a teratogen and fetotoxin in laboratory animals and has demonstrated mutagenic activity, in vivo, in mammalian cells. Methanol may cause moderate eye and skin irritation. Literature also reports an oral (rat) LD50 value of 13.0 ml/kg (10g/kg).

California Proposition 65 Warning (applicable in California only) - This product contains (a) chemical(s) known to the State of California to cause birth defects or other reproductive harm.

12. ECOLOGICAL INFORMATION

TOXICITY, PERSISTENCE AND DEGRADABILITY, BIOACCUMULATIVE POTENTIAL, MOBILITY IN SOIL, OTHER ADVERSE EFFECTS

This material is not classified as dangerous for the environment.
The ecological assessment for this material is based on an evaluation of its components.

RESULTS OF PBT AND vPvB ASSESSMENT

Not determined

HAZARDOUS INGREDIENT TOXICITY DATA

Component / CAS No.	Toxicity to Algae	Toxicity to Fish	Toxicity to Water Flea
Sodium dioctyl sulfosuccinate 577-11-7	Not available	LC50 20 - 40 mg/L - Oncorhynchus mykiss (96h) semi-static LC50 = 37 mg/L - Lepomis macrochirus (96h) static LC50 < 24 mg/L - Oncorhynchus mykiss (96h) static	EC50 = 36 mg/L - Daphnia magna (48h)

Component / CAS No.	Toxicity to Algae	Toxicity to Fish	Toxicity to Water Flea
Methanol 67-56-1	Not available	LC50 > 100 mg/L - Pimephales promelas (96h) static LC50 19500 - 20700 mg/L - Oncorhynchus mykiss (96h) flow-through LC50 = 28200 mg/L - Pimephales promelas (96h) flow-through LC50 18 - 20 mL/L - Oncorhynchus mykiss (96h) static LC50 13500 - 17600 mg/L - Lepomis macrochirus (96h) flow-through	Not available

13. DISPOSAL CONSIDERATIONS

The information on RCRA waste classification and disposal methodology provided below applies only to the product, as supplied. If the material has been altered or contaminated, or it has exceeded its recommended shelf life, the guidance may be inapplicable. Hazardous waste classification under federal regulations (40 CFR Part 261 et seq) is dependent upon whether a material is a RCRA "listed hazardous waste" or has any of the four RCRA "hazardous waste characteristics." Refer to 40 CFR Part 261.33 to determine if a given material to be disposed of is a RCRA "listed hazardous waste"; information contained in Section 15 of this MSDS is not intended to indicate if the product is a "listed hazardous waste." RCRA Hazardous Waste Characteristics: There are four characteristics defined in 40 CFR Section 261.21-61.24: Ignitability, Corrosivity, Reactivity, and Toxicity. To determine Ignitability, see Section 9 of this MSDS (flash point). For Corrosivity, see Sections 9 and 14 (pH and DOT corrosivity). For Reactivity, see Section 10 (incompatible materials). For Toxicity, see Section 3 (composition). Federal regulations are subject to change. State and local requirements, which may differ from or be more stringent than the federal regulations, may also apply to the classification of the material if it is to be disposed. The Company encourages the recycle, recovery and reuse of materials, where permitted, as an alternate to disposal as a waste. The Company recommends that organic materials classified as RCRA hazardous wastes be disposed of by thermal treatment or incineration at EPA approved facilities. The Company has provided the foregoing for information only; the person generating the waste is responsible for determining the waste classification and disposal method.

14. TRANSPORT INFORMATION

This section provides basic shipping classification information. Refer to appropriate transportation regulations for specific requirements.

US DOT

Dangerous Goods? X

Proper Shipping Name: Flammable liquid, n.o.s

Hazard Class: 3

Packing Group: III

UN/ID Number: UN1993

Transport Label Required: Flammable Liquid

Technical Name (N.O.S.): Methanol

Component / CAS No.	Hazardous Substances / Reportable Quantity of Product (lbs)
Methanol	41666.67

Comments: Hazardous Substances/Reportable Quantities - DOT requirements specific to Hazardous Substances only apply if the quantity in one package equals or exceeds the product reportable quantity.

TRANSPORT CANADA

Dangerous Goods? X

Proper Shipping Name: Flammable liquid, n.o.s

Hazard Class: 3

Packing Group: III

UN Number: UN1993

Transport Label Required: Flammable Liquid

Technical Name (N.O.S.): Methanol

ICAO / IATA

Dangerous Goods? X

Proper Shipping Name: Flammable liquid, n.o.s.

Hazard Class: 3

Packing Group: III

UN Number: UN1993

Transport Label Required: Flammable Liquid

Technical Name (N.O.S.): Methanol

IMO

Dangerous Goods? X

Proper Shipping Name: Flammable liquid, n.o.s.

Hazard Class: 3

UN Number: UN1993

Packing Group: III

Transport Label Required: Flammable Liquid

Technical Name (N.O.S.): Methanol

15. REGULATORY INFORMATION**Inventory Information**

United States (USA): All components of this product are included on the TSCA Chemical Inventory or are not required to be listed on the TSCA Chemical Inventory.

Canada: All components of this product are included on the Domestic Substances List (DSL) or are not required to be listed on the DSL.

European Economic Area (including EU): Cytec has appointed an Only Representative to relieve our customers from their registration requirements under the REACH Regulation (EC) No. 1907/2006. Please contact us if you wish to benefit from the OR arrangement.

Australia: All components of this product are included in the Australian Inventory of Chemical Substances (AICS) or are not required to be listed on AICS.

China: All components of this product are included on the Chinese inventory or are not required to be listed on the Chinese inventory.

Japan: All components of this product are included on the Japanese (ENCS) inventory or are not required to be listed on the Japanese inventory.

Korea: All components of this product are included on the Korean (ECL) inventory or are not required to be listed on the Korean inventory.

Philippines: All components of this product are included on the Philippine (PICCS) inventory or are not required to be listed on the Philippine inventory.

Taiwan: All components of this product are included on the Taiwan Chemical Substance Inventory (TCSI) or are not required to be listed on the Taiwan inventory.

OTHER ENVIRONMENTAL INFORMATION

The following components of this product may be subject to reporting requirements pursuant to Section 313 of CERCLA (40 CFR 372), Section 12(b) of TSCA, or may be subject to release reporting requirements (40 CFR 307, 40 CFR 311, etc.) See Section 13 for information on waste classification and waste disposal of this product.

Component / CAS No.	%	TPQ (lbs)	RQ(lbs)	S313	TSCA 12B
Methanol 67-56-1	8-12	None	5000	Yes	No

PRODUCT HAZARD CLASSIFICATION UNDER SECTION 311 OF SARA

- Acute
- Fire

16. OTHER INFORMATION

NFPA Hazard Rating (National Fire Protection Association)

Health: 3 - Materials that, under emergency conditions, can cause serious or permanent injury.

Fire: 3 - Liquids and solids that can be ignited under almost all ambient temperature conditions.

Instability: 0 - Materials that in themselves are normally stable, even under fire exposure conditions.

Reasons For Issue: New Format

Date Prepared: 04/20/2015

Date of last significant revision: 04/20/2015

Component Hazard Phrases

Sodium dioctyl sulfosuccinate

H315 - Causes skin irritation.

H318 - Causes serious eye damage.

Methanol

H225 - Highly flammable liquid and vapor.

H301 - Toxic if swallowed.

H311 - Toxic in contact with skin.

H316 - Causes mild skin irritation.

H320 - Causes eye irritation.

H331 - Toxic if inhaled.

H370 - Causes damage to organs.

Prepared By: Legal & Compliance Services; E-mail: custinfo@cytec.com

This information is given without any warranty or representation. We do not assume any legal responsibility for same, nor do we give permission, inducement, or recommendation to practice any patented invention without a license. It is offered solely for your consideration, investigation, and verification. Before using any product, read its label.

COVER DOCUMENT FOR A CLAIM OF CONFIDENTIALITY
45CSR31

Submitted On behalf of Cytec Industries Inc. - Willow Island plant,

Name: Michael A. Young
 Position: Site Manager
 Reason for Submission: Rule 13 New Product Emissions Determination Information
 R13-2120I, Section 4.5.1 [OT-GPG-N Surfactant]

Responsible Official
 Name/Title: Michael A. Young – Site Manager
 Address: Cytec Industries Inc.
 1 Heilman Avenue
 Willow Island, WV 26134
 Phone: (304) 665-3461
 Fax: (304) 665-3616

Identification of Claimed Confidential Information	Rationale for Confidential Claim	Confidential Treatment Time Period
1. Production Basis Calculation 2. Detailed Emissions Master Report	Business Confidential / Trade Secret Data for all Claimed Confidential / Maintain Advantage in Business Competitive Marketplace.	<u>Permanently</u> or <u>Indefinitely</u> for all Claimed Confidential.

The Claim of Confidentiality has not expired, been waived or withdrawn. (45-31-4.1.a)

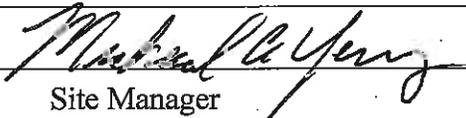
Cytec takes reasonable measures to protect the confidentiality of this information, which is not nor has been readily available or attainable to anyone without Cytec's knowledge, approval or authorization. (45-31-4.1.b, 4.1.c)

No statute specifically requires disclosure of this information. (45-31-4.1.d)

Additionally, disclosure of this information will cause substantial harm to Cytec's competitive business position for this process. (45-31-4.1.e.1)

The non-confidential white paper submittal depicts redaction of CBI and the words "**Redacted Copy - Claim of Confidentiality**" marked on each page containing CBI.

No emissions data is claimed confidential.

Responsible Official Signature:	 (Michael A. Young)
Responsible Official Title:	Site Manager
Date Signed:	<i>May 8, 2015</i>

OT-GPG-N MAXIMUM PRODUCTION BASIS

"REDACTED COPY - CLAIM OF CONFIDENTIALITY"

Shortest anticipated cycle time achievable = [REDACTED] hr/ba

Maximum available processing hours:
365 day/yr X 24 hr/day = [8,760] hr/yr

Maximum potential production batches:
[REDACTED] ba/yr

Basis for maximum annual emission rates:

Pollutant	Emission Factor (lb/ba)	Maximum Annual Emissions (tpy)
VOC	[REDACTED]	0.1224
HAP	[REDACTED]	0.1223
SO2	[REDACTED]	0.026
PM	[REDACTED]	0.025

Basis for maximum hourly emission rates:

VOC: VOC emissions from Step# 21.
Step time =0.5 hr --- total emissions=0.2003 lb --- max. emissions=0.20lb/hr

HAP: Methanol emissions from Step# 21.
Step time =0.5 hr --- total emissions=0.2003 lb --- max. emissions=0.20lb/hr

SO2: SO2 emissions from Step# 11.
Step time =1.0 hr --- total emissions=0.146 lb --- max. emissions=0.15lb/hr

PM: Soda Ash emissions from Step# 5.
Step time =0.25 hr --- total emissions=0.072 lb --- max. emissions=0.072lb/hr

CYTEC INDUSTRIES INC.
AEROSOL® OT-GPG-N

"REDACTED COPY - CLAIM OF CONFIDENTIALITY"

Supporting Calculations - Emission Master Model Report

Emission Master 7.6.1.19 4/24/2015 13:50 page 1
C:\DATA\WI Emissions Modeling\Emission Master Models\Surfactants\OT-GPG-N to Drums.emm

Title Page

Product: OT-GPG-N
Process: OT-GPG-N Sulfonation
Process Cycle Time: [REDACTED]
Evaluation Date: 3/25/2015
File Name: C:\DATA\WI Emissions Modeling\Emission Master Models\Surfactants\OT-GPG-N to Drums.emm
Connected Database: Emaster_Surfactants = C:\DATA\WI EMISSIONS MODELING\DATA\Emaster_Surfactants
Calculation type: MACT98
Condenser Calc. type: Single Stage
Charge Calc. type: Initial Composition
Last Saved User: eichinger1
Last Saved Time: 3/31/2015 9:15
Comment:

Defined Activities

REPORT	PURPOSE
Recipe Summary Emissions Report	Total emissions by chemical for entire recipe